

The Honorable Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEON COLE,

Plaintiff,

V.

AMAZON.COM SERVICES LLC;
AMAZONFRESH LLC; and DOES 1
through 2, inclusive.

Defendants.

No. 2:24-cv-01147-TL

**STIPULATED MOTION AND
[PROPOSED] ORDER
EXTENDING CASE DEADLINES**

**NOTE ON MOTION CALENDAR:
March 3, 2025**

STIPULATED MOTION

Pursuant to LCR 7(d)(1) and 10(g), Plaintiff Deon Cole and Defendants Amazon.com Services, LLC and AmazonFresh LLC (collectively “Amazon”), jointly request and stipulate to extend certain case deadlines. The Parties previously stipulated to extensions of the case deadlines three times, which the Court granted. *See* Stipulations and Order (Dkt. Nos. 30, 38, 41-42). The Parties make this request by stipulated motion, in accordance with the Court’s recent directive. *See* Notice to Parties Regarding Deadlines (Dkt. No. 42) at 2 (“[S]hould the Parties seek to extend additional deadlines going forward, they must file an appropriate motion requesting as much.”). In support of this stipulated motion, the Parties state as follows:

**STIPULATED MOTION AND [PROPOSED] ORDER
EXTENDING CERTAIN DEADLINES (2:24-cv-01147-TN) - 1**

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1. On March 28, 2024, Plaintiff filed a complaint against Amazon in Los Angeles
 2 Superior Court. The case was transferred to this Court on July 26, 2024, Order (Dkt. No. 21),
 3 and Plaintiff filed his Amended Complaint on September 26, 2024. Am. Compl. (Dkt. No. 32).

4. On November 1, 2024, Amazon moved to dismiss the Amended Complaint. Mot.
 5 to Dismiss (Dkt. No. 37). The Court granted the Motion on February 2, 2025, and ordered that
 6 any second amended complaint shall be filed no later than March 10, 2025. Order (Dkt. No. 44).

7. The Parties previously sought extensions of certain case deadlines, including the
 8 deadline to conduct a Federal Rule of Civil Procedure 26(f) Conference, the deadline for Initial
 9 Disclosures, and the deadline for filing a Joint Status Report, Stipulations (Dkt. Nos. 30, 38, 41),
 10 which the Court granted, Notice to Parties Regarding Deadlines (Dkt. No. 42).

11. Given that Plaintiff intends to file a second amended complaint, and that Amazon
 12 intends to file a motion to dismiss that amendment, the Parties jointly agree to extend certain
 13 case deadlines in anticipation of that amendment and motions practice. Good cause exists for
 14 this extension because if the Court were to grant Amazon's second motion to dismiss and close
 15 the case, then compliance with these case deadlines would become moot. Accordingly, in the
 16 interest of judicial economy, and avoiding potentially unnecessary costs for the Parties, the
 17 Parties stipulate to extend certain case deadlines as follows:

Case Event	Current Deadline	Proposed Deadline
Deadline for FRCP 26(f) Conference	3/10/2025	7/11/2025
Deadline for Initial Disclosures	3/24/2025	7/25/2025
Deadline for Filing Motion to Dismiss Second Amended Complaint	3/24/2025	4/7/2025
Deadline for Filing Opposition to Motion to Dismiss Second Amended Complaint	4/21/2025	5/5/2025
Deadline for Filing Reply in Support of Motion to Dismiss Second Amended Complaint	5/12/2025	5/19/2025
Deadline for Joint Status Report	4/7/2025	8/8/2025

5. Based on the foregoing, the Parties respectfully request that the Court grant this stipulated motion and extend the case deadlines as set forth in the Proposed Order below.

Stipulated to this 3rd day of March, 2025.

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AmazonFresh LLC

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~~PROPOSED~~ ORDER

The Court GRANTS the Parties' stipulated motion and the case deadlines are extended as follows:

Case Event	Current Deadline	Proposed Deadline
Deadline for FRCP 26(f) Conference	3/10/2025	7/11/2025
Deadline for Initial Disclosures	3/24/2025	7/25/2025
Deadline for Filing Motion to Dismiss Second Amended Complaint	3/24/2025	4/7/2025
Deadline for Filing Opposition to Motion to Dismiss Second Amended Complaint	4/21/2025	5/5/2025
Deadline for Filing Reply in Support of Motion to Dismiss Second Amended Complaint	5/12/2025	5/19/2025
Deadline for Joint Status Report	4/7/2025	8/8/2025

IT IS SO ORDERED this 4th day of March 2025.



HONORABLE TANA LIN
UNITED STATES DISTRICT JUDGE

PRESENTED BY:

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and AmazonFresh LLC

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